Ont. Transportation, Roy. Comm. on.
Submitted by Ont. Movers Ass. #28
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REPORT

AND

PLEA

AS PREPARED FOR THE CONSIDERATION OF THE

ROYAL COMMISSION ON TRANSPORTATION

appointed by the Government of the Province of Ontario under and Order-in-Council approved by the Honourable, the Lieutenant-Governor, dated August 26th, 1937.

SUBMITTED BY

THE ONTARIO MOVERS' ASSOCIATION

(Approved by unanimous vote of the Board of Directors of the Ontario Movers' Association at a meeting held in the City of Hamilton on Friday, October 15th, 1937.)

Fred May, Hamilton
President.

Frank B. Dixon, London
Treasurer.

A. MacDougall, Hamilton
Secretary.

Directors

Max Campbell, Windsor
Russell R. Forbes, Hamilton
A. L. Lewis, Windsor
Alex. J. Anderson, London
Fred G. Bigham, Woodstock
William Pickard, Toronto

The Honourable Justice E. R. E. Chevrier,
Chairman,
The Royal Commission on Transportation,
Toronto, Ontario.

Honourable Sir:-

We beg to report the results of despatching to each member of our Association a Questionnaire, upon the answers to which we relied to prepare a brief revealing conditions and facts related to the moving of household goods, furniture and fixtures over the highways of the Province of Ontario.

Of fifty-one questionnaires mailed, eleven were returned, the majority of these with only partial replies. Of the eleven who answered the Questionnaires, not one operator, according to the replies, has divisions in his accounts or books of record which show revenue and costs of long distance moving separate from those of local cartage. We regret to report that no fair presentation of revenue and costs can be made to your Commission on the data obtainable from the returns to date.

Several reasons may be advanced for the paucity of results to this polling of our membership in the search for facts and figures, but chiefly, and reflective of the general lack of cost consciousness on the part of the industry, is the fact that a great majority of the operators either keep no books whatever, or, at best, have utterly inadequate records.

No attempt was made to analyse the eleven Questionnaires returned because of the futility of so doing.

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The Ontario Movers' Association is an association of long distance moving van owners and operators carrying household goods and furniture over the highways of Ontario.

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It was formed on February 7th, 1936 in the City of Toronto. It has fifty-one members in good standing, all of them holding Public Commercial Vehicle licenses to haul used household goods and furniture in Ontario. No purely local movers have been accepted into membership. The members comprising the Association own the majority, by far, of the furniture vans used in long distance haulage of household goods, furniture and fixtures within the Province of Ontario.

It ought to be said, as being relevant to the matters at issue, that the Association was formed chiefly because there was a crying need for the betterment of conditions in the industry and the increasing of the rates generally prevailing at the time if many of the operators were to survive. Pleas from individual operators to the Government to step in and give relief in the form of a law-enforced tariff had been met with the suggestion that members of the industry should get together first and attempt to clean their own house. The formation of the Association was the first step in this direction.

THE VOLUNTARY TARIFF

The second important step in this direction was the publication of a tariff of rates, and the general voluntary adoption of this tariff by both members of the Association and many non-members. This tariff was endorsed and subscribed to by fifty-six operators licensed to carry used household goods and furniture in Ontario. It went into effect on Monday, November 16th, 1936. On this date, according to records procured by the Automotive Transport Association from the Department of Highways of the Province of Ontario, there were eighty-seven operators holding Class "H" Public Commercial Vehicle licenses, and of these fifty-six agreed to abide by the Tariff as published by the Association. It is worthy of mention here that not all of the eighty-seven operators mentioned were contacted by the Association with the invitation to join in with the effort to establish rates, but rather the efforts of the Association were confined to the following cities: Toronto, Hamilton, Brantford, Kitchener, Woodstock, London, Windsor, Niagara Falls, Dunnville, Oshawa,

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Kingston, Belleville, and Ottawa. Definitely, therefore, sixty-five per cent of the holders of Class "H" Public Commercial Vehicle licenses in the Province of Ontario adopted the tariff of rates as published by the Association, and, if other operators were added who have since adopted the tariff but who were not included in the original signatories, the percentage should be increased to about eighty per cent of the operators as at date of the adoption of the tariff.

The conclusion to be derived from the overwhelming number of Class "H" Operators who signed this tariff is what the moving industry, at least, is heartily of the belief that tariffs are required to bring the relief necessary to right the existing conditions. It was not a case of seeing how much more profit could be derived from the public, but rather how could present losses be turned into profits and thus allow the operators to carry on.

With the improved rates, in some cases, came better wages, and better conditions for drivers and helpers, although by no means were these improvements uniform throughout the industry, as they would be, in all likelihood, if the tariff were to be enforced as law.

After almost one year's trial of the voluntary tariff it is the unanimous opinion of the Board of Directors of the Association that whilst the said tariff has had a tremendous effect in steadying and stabilizing the unsettled conditions prevailing at date of its institution, it will not produce a permanent and satisfactory solution to the ills of the moving industry if continued in its present form and left to voluntary fulfillment. Following are some of the reasons which bring the Board to this conclusion:

1. Some signatories to the Tariff have weakened and returned to the old method of "chiselling", that is, taking business from their competitor by the simple expedient of cutting prices;

2. Competitor-operators in self-defence are now attempting to retain and, in some cases where business has been lost to such methods, to regain business by following the same pro-

cedure;

3. Operators who did not subscribe to the Tariff have taken unfair advantage by telling prospects that those movers who did subscribe are members of a combine inimical to public interest;

4. The present voluntary tariff is computed on a cubical basis (See appendix: Ontario Movers' Association Tariff and Listing Form) Errors, both honest and deliberate, enter into such a method only too frequently and tend to destroy confidence, and more especially when participants to such a tariff are volunteers. The alternative method of computing a rate is upon the weight basis, where weight only determines the charge to be levied. This method is only operative when enforced by law. It is the method, flanked by suitable regulations designed to aid the public and the employee, at present in use in the State of Michigan. (See Appendix M.P.U.C.No. 1). According to Mr. Harold H. Hardy, Secretary Treasurer of the Michigan Furniture Warehousemen's Association, it is highly satisfactory, and has worked out in the interests of public and employees as well as the operators.

5. The limited education of a great many operators resulting in a disinclination, if not incapacity, to list and figure out the total cubical content of a given lot of furniture, and to further carry that deduction into mileage and then to the final charge involved and discoverable by reference to the published tariff. Most of the Carriers who own their own equipment make no pretense at having a regard for books or figures; the very nature of their work inclines them in the opposite direction, leaving them positively averse to patiently taking every article of furniture to be moved, computing its cubical content by reference each time to a table, and adding all such computations together to obtain a final cubical estimate of the load.

6. Sufficient consideration, in a voluntary tariff without enforcement by law is not usually given to problems concerning the public and employees of the operators. Such problems and their solution rightly and appropriately should precede any relief granted by the use of a tariff, or, at the very least, should accompany the instituting of such a

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A lone operator, here or there, does give conscientious thought to either or both the public and the employees, and may take sporadic action as a result. But the majority are afraid to take forward steps of this nature entailing greater expenditures, for the fear that the voluntary tariff might collapse at any time, leaving them as a consequence, in a serious plight.

THE MOVING BUSINESS

The moving business today is a highly specialized form of haulage, requiring specially trained men and special equipment. To give proper service to the public in the carriage of household goods and furniture, covered vans must be used, and a free use made of pads and packing material not called for in the haulage of ordinary merchandise.

The problems of movers are not akin to those confronting freight carriers, in that movements of furhiture do not conflict with other forms of interurban transport. Our competition lies almost entirely within its own field. The railroads, recognizing the peculiar nature of the service entailed, are loath to enter this particular field, and only on rare occasions have they accepted uncrated household goods for shipment. The railroads do accept crated furniture and household goods for shipment, but due to the expense involved in crating, such a method of shipping is feasible only on very long distances. Most movers co-operate with the railroads where such distances are involved, and recommend shipping by rail in such cases. The majority of movers also have expert craters and packers in their employ, and are content with the crating and packing portion of a long haul contract. Thus rail and moving van transportation is in tacit alliance, and not, to any appreciable extent in direct competition.

A serious competitive situation has existed in our industry throughout the depression years. Rates have been set not on the basis of cost of operation, but on the basis of what price could be obtained.

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A serious competitive situation has existed in our industry throughout the depression years. Rates have been set not on the basis of cost of operation, but on the basis of what price could be obtained.

The growth of local movers, any of whom with $25.00 to $50.00 to put down on a truck and a few pads or quilts could start in the business, and the subsequent entrance of such operators into the long distance field has caused the total number of operators in this business to materially increase during "the depression." This type of operator has operated at rates which would barely provide a subsistence and buy gasoline. With no overhead costs, and no depreciation charge or upkeep, he has been taking work at any figure obtainable, and thus kept the rates of the small legitimate operator down below a profitable point, and also affected seriously the larger operators. This sort of situation has detrimentally affected the standards of the industry.

The company operating a household goods moving department at a profit is the exception rather than the rule, and in many cases, had not that department been supplemented by one yielding a profit, such as storage, many businesses would not have survived.

MAXIMUM WORKING HOURS

We respectfully refer your Commission to the regulations respecting the maximum of working hours, Paragraphs 18 and 18-A, Order-in-Council, dated February 22nd., 1936, and we would plead that these hours are utterly impracticable if applied against furniture-moving operators in our Province.

On behalf of the public, labor and operators, we ask that a thorough study of this matter be made by your Commission with a view to recommending that these regulations be changed as affecting our industry.

Adherence to the present regulations will bring about a burdensome increase in the costs of moving furniture long distance, and following we advance some reasons for this prediction:

1. The customer is seriously handicapped by reason of the increased time taken for the movement of the furniture from city to city.

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Hotel bills are incurred thereby, and this becomes a more serious factor when there are families involved, not alone because of the increased cost but, as well, the increased inconvenience.

2. The moving of household goods is largely an emergency business. It is not operated on a regular schedule or route, and no definite terminals can be set up where relays of drivers may be located. The additional costs, therefore, of garaging vans and hotel and other expenses for drivers and helpers incurred during stop-over time is another serious factor.

3. Unless an increase of the number of hours in operating were allowed, it would be necessary in moving furniture to Kitchener, for instance, a distance of only 73 miles from Toronto, to load up, take the furniture to Kitchener, unload, and have the men stay there overnight with all the additional hotel and garage expenses, and return to Toronto the next day.

4. Moving household furniture takes place at peak times in the month and the year, and, due to this, there are occasions when the present equipment is insufficient. If the productive running time per van is cut down, it will be impossible for the present amount of equipment to be sufficient for public requirements at these peak times. This will necessitate purchasing more equipment in order to give the service, and as a result there will be more equipment lying idle during the off-season amounting to about nine months in every year.

5. A reference to a table in the Appendix will show the small number of days that a piece of equipment averages on long distance work. Out-of-town moving is required at times coinciding with requirements for in-town moving. Thus equipment used for performance of long distance moving is idle most of the time that it is not on the highway.

6. The situation with regard to labor, under the present regrettable competition, is another serious factor. There are no standards enforced with respect to wages, and most operators are forced under existing conditions to employ all or a large number of their employees on the hourly basis.

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Naturally if their hours, which are not now excessive due in great measure to the off-seasons, are further reduced, they will be unable to lay anything aside for the periods when there is little employment, and their only recourse will then be relief for the idle periods.

7. The safe-driving record of the Ontario furniture movers for the years during which this provision with respect to hours was not applied has been highly satisfactory, and, as far as we are aware, has not produced an accident of any kind due to weariness or fatigue on the part of the driver.

8. Throughout our long period of cold weather, operation of trucks on the highways is made more difficult. Not having definite routes or schedules, furniture moving operators cannot set up terminals. There are few garages in Ontario that can house the large covered vans required for the carriage of furniture. If a reasonable amount of time were not granted for continuous operation of these vans, long stop-over periods would have to be made. Serious damage can come to both equipment and the customers' furniture if the vans were allowed to remain either outside or in insufficiently heated garages during the stop-over period made necessary under the present law.

9. The problem of guarding the customers' goods is a formidable one, and entails either a driver or his helper remaining constantly on the vehicle, or the employment of special guards. If the law with respect to hours of labor is enforced, the latter course is the only one open. The question then arises as to how trustworthy guards could be acquired and further as to the serious effect of passing the cost of employing guards, even if they were obtainable, on to the customer.

CLASS "H" LICENSE

We also respectfully request your Commission to give consideration to the rights and privileges of Class "H" Operators, as described in Section G, Regulation No. 2 of the Order-in-Council, February 22nd., 1936.

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CLASS "H" LICENSE

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We ask that this legislation be recommended to be changed to allow the Department of Highways to grant special permission to a Class "H" operator to transport any class of goods that requires the special class of attention that can be supplied by furniture movers.

We further ask that your Commission make a study of the present enforcement machinery, as it is our considered opinion that the Act is not being adequately enforced, due largely, we believe, to the limited number of officers available so to do.

We would further urge, in this respect, that all Provincial officers be schooled in the particular provisions of the Public Commercial Vehicles Act, and that it be recommended that they, as well as the special inspectors set aside for the purpose, be ordered to look for and apprehend violators of the Act, in addition to their ordinary duties.

ONTARIO MUNICIPAL BOARD

It is the considered opinion of our Association that licenses have been granted by the Ontario Municipal Board which were not granted fairly on the question of "public necessity and convenience". We believe it to be desirable to guard the public, and existing operators whose interests surely precede those of new applicants, by further legislature defining more clearly what is meant by "public convenience and necessity". We would urge, further, that a very thorough investigation be made with a view of finding whether the disposition of said applications would not be more satisfactorily dealt with by an independent commission or Board set up for this specific purpose. We desire to deplore the practice of the Board in certain cases of ordering a private investigation by an inspector of the Department of Highways which the results of interested operators are not given opportunity to refute or confirm.

We ask that this legislation be recommended to be changed to allow the Department of Highways to grant special permission to a Class "B" operator to transport any class of goods that requires the special class of attention that can be supplied by furniture movers.

We further ask that your Commission make a study of the present enforcement machinery, as it is our considered opinion that the Act is not being adequately enforced, due largely, we believe, to the limited number of officers available so to do.

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COMPULSORY FILING OF TARIFFS

We further respectfully request that it be recommended by your Commission that all operators of long distance furniture moving vans in Ontario be required to file with the Department of Highways, or some such body set-up for the purpose, a tariff of their rates and conditions of service, such tariff of rates to be based upon weight and not cubical content. We further request that it be recommended that the Government enforce the charging of tariffs in exact accordance with the regulations, terms and rates of the tariffs filed. In brief, we recommend that the plan now being worked out with success by the Interstate Commerce Commission of the United States of America be adopted in the Province of Ontario, and that some study be given to the possibility of some form of international uniformity with respect to procedure under this plan.

We stand ready, as an Association, to lend our aid and co-operation in working towards a solution of the problems as outlined in this report and plea, and we earnestly believe that a solution can be found which will be thoroughly satisfactory to the interests of the Government, the public, the employees and the operators.

All of which, Honourable Sir, is respectfully submitted on behalf of the Ontario Movers' Association by your humble servant.

PRIVATE COMMERCIAL VEHICLES

We respectfully entreat your Commission to consider the unfair competition both to rail and transport which is resident in the fact that Private Commercial Vehicles are not required to pay the Public Commercial Vehicle Tax. We consider this utterly discriminatory and devoid of equity. We are of the opinion that in order that all transports be placed upon an equal footing there ought to be a tax levied of like amount against both private and commercial vehicles which carry the same or a similar class of goods. Certainly it is apparent that there is here discrimination and inequity of a very unfair nature, and we earnestly plead that selfish influence of large corporations seeking to avoid the levying of such a tax ought to be set aside to make way for impartiality.

President of the Association

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Submitted by Ont. Motors Ass'n.
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The Honourable Justice E. R. E. Chevrier,
Chairman,
The Royal Commission on Transportation,
Toronto, Ontario.

Honorable Sir:

During the public hearings held by your Commission to inquire into transportation in the province of Ontario, you instructed our Association through its Board of Directors to answer several questions pertinent to your investigation into phases affecting our section of the transportation industry.

For the sake of brevity, and clarity, we give the questions in the order in which Commission Counsel Singer gave them to Mr. May, who is acting on our behalf throughout the hearings, and appended immediately following we give the answers. All the answers were moved and properly passed as motions at a meeting of the Board of Directors called for the express purpose of considering the problems set out, and to offer to your Commission the viewpoint of our membership.

QUESTION 1: What is the desire of the industry regarding present Labour Board legislation, and is any change necessary, in its opinion, to make existing legislation more effective?

ANSWER: We ask the Commission to consider recommending that the existing legislature, known as the Industrial Standards Act, 1935 (with ammendments of 1936 and 1937), be further amended, and that such amendment may conveniently be added to Part 2, paragraph 7, of the said Act, adding to said paragraph the words: "The Minister shall appoint a Board of Arbitration in the event of disagreement of the parties

and of the Employees Association

involved, the said Board consisting of not less than three appointees, and that the Board shall have the power to settle upon the terms of an agreement, which shall then be enforced as law upon all parties involved." We feel the need of some machinery to break a deadlock.

QUESTION 2. If regulations with respect to tolls, tariffs and possibly wages were brought down, how should such a law be enforced, and should the industry be required to pay the charges therefor?

ANSWER: We submit that if such regulations were brought down it would be in the interests of the public, as well as the industry, which is now taking care of a reasonable share of costs for policing, and that in the event further expenses shall be incurred in policing such regulations or law, the extra cost should be passed along to general taxation, and thus borne partially by the public.

QUESTION 3. Define "Public necessity and convenience".

ANSWER: It is difficult to answer this question, but we respectfully draw the attention of the Commission to Bill 31, now before the Federal House, Part 1, Paragraph 5. We would further suggest, however, that it ought to be incumbent upon the Department of Highways to notify all licensed operators affected by the application, which could readily be done by reference to the files of the Department. In such an important matter as the granting of a license to serve a given territory, it is only fair that every operator who may be affected by the granting of such a license be notified of the application and given the opportunity to appear, like the applicant, before the Board.

QUESTION 4. Provide a schedule of wages, which in the opinion of your Association would approximate the ideal, having in mind the peculiar nature of the moving business with its peak seasons. Also, provide the average hours of peak

seasons, taking the experience of representative members.

ANSWER: After discussion, Mr. Basil Tippet was asked to appear before the Commission on behalf of the Association and explain the position of the Board with regard to this very important problem. Mr. Tippet kindly consented to do this, but the conclusion of the public hearings prevents carrying out this plan. Mr. Tippet has therefore prepared a paper, herewith appended, setting forth the opinion of the Board in this matter.

QUESTION 5. What limits ought to be placed on the size of vehicles?

ANSWER: It was agreed that the width and length of Commercial Vehicles ought to be left as they are in the Regulations of the Highway Act.

The foregoing, we trust, cover satisfactorily the questions given to us by Mr. Singer, and their answers.

We would respectfully draw your attention to one matter which we believe to be of great importance and upon which we fear adequate light has not been thrown. It is the question of whether Private Commercial Vehicles ought to pay the same in taxation as Public Commercial Vehicles. It would be an impertinence on our part to go over old testimony, for we have received gracious and ample opportunity to present our views with regard thereto. But learned counsel for the Commission kept presenting a view-point which we humbly submit, is not in accordance with facts which ought to be brought before the Commission. The facts referred to may be obtained from the Public Commercial Vehicle Branch of the Department of Highways.

Learned counsel for the Commission has kept insisting that if Private Commercial Vehicles are taxed as are Public Vehicles, they should be allowed to carry all classes of merchandise, other than their own goods, upon return move-

ments. The first fact lost sight of is that they are allowed to carry goods on return movements, providing those goods have been purchased by the owner of the vehicle, who is in the majority of cases, a store, or wholesale house. This privilege is a great deal broader than that allowed by the majority of licenses owned by Public Commercial Vehicle operators. The second fact obscured to learned counsel, we respectfully submit, is that no license yet issued by the Department of Highways carries with it such broad rights, either with respect to the territory covered or the goods carried, as learned counsel has in mind in his argument. The files of the Department will bear irrefutable proof of this. The third fact lost sight of is that many licenses have been granted covering Public Commercial Vehicles which are restricted to far less rights and privileges than are now enjoyed by Private Commercial Vehicles. The contention of our Association is that the failure to assess the Private Carrier exactly on the same basis as the Public Carrier sets up discrimination and unfair competition.

We desire in conclusion to express our appreciation of the consideration and impartiality shown by your Lordship and your worthy Commissioners. May we respectfully add a word of praise in this very same connection for learned Counsel for the Commission, Mr. Joseph Singer, K.C., for the able engineer, Mr. Wilson, and for the courteous and efficient secretary, Mr. Dalton C. Wells.

All of which we respectfully submit on behalf of our Association.

ONTARIO MOVERS ASSOCIATION

President.

Ont. Transportation, Reg. Com. on.

Submitted by Ont. Movers Assoc

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[Ontario Movers' Association]

RECOMMENDATIONS FOR SPECIFIC CHANGES

IN PRESENT P.C.V. REGULATIONS AFFECTING HOURS OF DRIVING.

Present Section - 18 and 18a :

"Except as provided in paragraph 18a of these Regulations no person owning, controlling or managing any Public Commercial Vehicle shall drive more than a maximum of ten hours in any twenty-four hour period, nor shall any person after having been employed in any other capacity drive a Public Commercial Vehicle, if by so doing the total period of employment or work in the capacity of driver, or otherwise, exceeds ten hours in any twenty-four hour period.

"Time occupied riding or being upon a Public Commercial Vehicle in the capacity of helper, relief driver or otherwise, shall for the purpose of this Regulation be considered the same as driving time.

"The Department may grant special written permission extending the permissible period of driving providing application for such permission is made in writing and in advance of date required when in the opinion of the Department there are circumstances which justify such an extension."

We submit for the reasons which follow, that those regulations are not the best for the public interest nor for the furniture moving interests and accordingly recommend the following:

HOURS OF DRIVING

(a) No owner of a commercial vehicle shall permit or require any driver in his employ to remain on duty for a total of more than 60 hours in any week, or more than a total of 15 hours, of which no more than 12 shall be driving time, in any period of 24 consecutive hours. Special hours over the above may be allowed by the Minister for moving furniture during the peak periods .

(b) Time spent by a driver resting or sleeping in

and to Professor Jackson

a berth (sleeper cab) properly equipped for sleeping shall not be computed as time on duty.

(c) In case of flood, storm, accident or similar emergency, a driver may complete his run without being in violation of the provisions of these regulations, if such run would reasonably have been completed without violation except for the delay caused by such emergency.

The reasons which we submit are as follows:
The 10 hour driving limit is impracticable for the furniture moving industry because -

(1) The furniture moving industry does not operate its highway furniture vans on fixed routes or daily schedules. It is always a contract or emergency business. The public therefore demands that the lapsed time be as short as possible. Their separation from necessary household furnishings - the care of children away from home - the hotel cost during period of removal from city to city, lie behind the reasonable pressure for quick transfer. Quotation from I.C.C. Hours of Service Regulation. (Effective July 1st, 1938.) "A rapid return of the vehicle is necessary during the season of heavy movements in order that service may be rendered as required. Similar conditions are found to a considerable extent in the long distance moving of household goods. In this field, the shippers desire, and there probably is a necessity for, delivery of furniture at destination in the shortest possible time."

(2) The time for loading and unloading a van of furniture takes most of the 10 hours, which means to transfer furniture between nearby cities or town requires longer than the 10 hours unless the owner is burdened by greatly increasing the cost - his own direct as suggested and his indirect cost through the operator's stop-over increased expense.

(3) Furniture movers not only do not go to certain points with regularity, but have most annual revenue gathered

in peaks - at month ends and especially during a short spring and fall period. The years average daily use of Long Distance Vans including loading and unloading is 4 hours. The public's demand on the industry can only be supplied during these rush periods by longer daily use of equipment and employment of men than the 10 hours provide.

Otherwise - more equipment must be first- owned, and secondly- manned. For the first the additional expense must be borne by the users. For the second, this in practice is almost impossible. Furniture moving men are trained to pack china and to carefully load vans and generally to handle furniture skilfully - and this training takes time. To put on untrained men at peak times would not serve the public interests - nor the men.

To train men and employ them only at peak times on average hours, even at good wages, does not provide those men with enough revenue for a year's living. During the slack season for Long Distance work, other furniture moving work is slow. It is necessary that trained men in this field be allowed to work in the peak season longer than the present law allows - consistent with safety - for their own interests. That safety control is present, is shown by the Ontario Workmen's Compensation records - favorable to the Furniture Moving Industry when segregated from the Transport group in their Class 20, Group O.

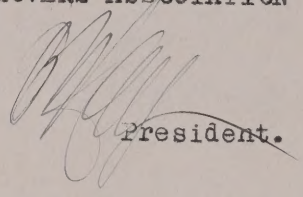
WAGES

Owing to the spasmodic nature of the furniture moving business - for the reasons already given - most companies at present pay men by the hour. In busy seasons, when paid a fair hourly rate, men earn good wages - but there are weeks in the year when little work of any kind is offering. When considering limiting the weekly hours to be worked, the years average weekly hours should be considered.

Insufficient evidence is available for the number of average weekly hours worked. A minimum weekly wage would be difficult in application and must take into consideration the peculiarities of the furniture moving business - through which the public makes heavy demands upon labour for practically only a few days twice each month.

Therefore, under present conditions in the moving industry, labour must be paid on the hourly basis. We would suggest a minimum wage of forty cents per hour be established in our branch of the industry, with special consideration being ~~given to smaller towns and centres where living costs may be lower.~~

ONTARIO MOVERS ASSOCIATION



~~President.~~